Brett L. Tolman #8821 Loren E. Weiss, #3969 Eric G. Benson #10414

# RAY QUINNEY & NEBEKER P.C.

36 South State Street, Suite 1400 P.O. Box 45385 Salt Lake City, Utah 84145-0385 Telephone: (801) 532-1500

Fax: (801) 532-7543

Attorneys for David Young & Hernando County Holdings, LLC

\_\_\_\_\_

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

VS.

APPROXIMATELY UP TO \$15,253,826 IN FUNDS CONTAINED IN THIRTEEN BANK ACCOUNTS, et. al.,

Defendants.

# AMENDED NOTICE OF VERIFIED CLAIM FOR DAVID YOUNG

Case No. 2:11-CV-00806-DAK

Honorable Dale A. Kimball

By and through undersigned counsel, David Young ("Young") makes his amended claim and asserts his interest against the United States of America in and to the following:

- 1. Bank of America (BOA) Account No. 52871769 in the name of World Wide Trainers (WWT). Young, a corporate officer of WWT, hereby asserts a claim in this property for and on behalf of WWT.
- 2. BOA Account No. 52871424 in the name of Paper Mill Village. Young, a manager and owner of Paper Mill, hereby asserts a claim in this property for and on behalf of Paper Mill Village.

- 3. BOA Account No. 52471686 in the name of Welventure. Young, as a corporate officer and partial owner of Welventure, hereby asserts a claim in this property for and on behalf of Welventure.
- 4. BOA Account No. 52068676 in the name of Welventure. Young, as a corporate officer and partial owner of Welventure, hereby asserts a claim in this property for and on behalf of Welventure.
- 5. BOA Account No. 52771699 in the name of Welventure. Young, as a corporate officer and partial owner of Welventure, hereby asserts a claim in this property for and on behalf of Welventure.
- 6. BOA Account No. 52871764 in the name of WWT. Young, as a corporate officer of WWT, hereby asserts a claim in this property for and on behalf of WWT.
- 7. BOA Account No. 52371356 in the name of Hernando County Holdings (HCH). Young, as a manager of HCH, hereby asserts a claim in this property for and on behalf of HCH.
- 8. BOA Account No. 52471407 in the name of HCH. Young, as a manager of HCH, hereby asserts a claim in this property for and on behalf of HCH.
- 9. BOA Account No. 52371757 in the name of Welventure. Young, as a corporate officer and partial owner of Welventure, hereby asserts a claim in this property for and on behalf of Welventure.
- 10. SunTrust Bank Account No. 1000130593063 in the name of Woodruff & Company. Young, as the manager of HCH, hereby asserts HCH's interest in the money held in the name of Woodruff & Company (now known as SunCoast CPA Group) for and on behalf of HCH.

- 11. Real property located at 45 Pleasant Street, Alstead, New Hampshire. Young, individually and as the manager and owner of Paper Mill Village, hereby asserts a claim on behalf of himself individually and on behalf of Paper Mill Village's interest in the property.
- 12. Real property located at 3511 Casa Court, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 13. Real property located at 4004 Centavo Court, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 14. Real property located at 4072 Pine Dale Court, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 15. Real property located at 4483 Flounder Drive, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 16. Real property located at 4115 Des Prez Court, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 17. Real property located at 4054 Flamingo Boulevard, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.

- 18. Real property located at 3174 Gulf Winds Circle, Spring Hill, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 19. Real property located at 3371 Gulf Winds Circle, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 20. Real property located at 3312 Gulf View Drive, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 21. Real property located at 3166 Gulf View Drive, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 22. Real property located at 7332 Grand Boulevard, New Port Richey, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 23. Real property located at Parcel Number 323-25-16-0350-00B00-0010, New Port Richey, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 24. Real property located at 3223 Hibiscus Drive, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.

- 25. Real property located at 3339 Gulf Winds Circle, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 26. Real property located at 4104 Pine Dale Court, Hernando Beach, Florida. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 27. One 2006 Hummer H3, VIN 5GTDN136468257156. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 28. One 2002 Sea Ray Mercruiser, SERV3186A202, Title 87282109. Young, individually and as the manager of HCH, hereby asserts a claim on behalf of himself individually and on behalf of HCH's interest in the property.
- 29. 225 one-ounce American Eagle gold coins. Young, individually and as the corporate officer and partial owner of Welventure, hereby asserts a claim on behalf of himself individually and on behalf of Welventure's interest in the coins.
- 30. 200 one-ounce South African Gold Krugerrand coins. Young, individually and as the corporate officer and partial owner of Welventure, hereby asserts a claim on behalf of

himself individually and on behalf of Welventure's interest in the coins.

Dated this 17<sup>th</sup> day of April, 2012.

RAY QUINNEY & NEBEKER P.C.

/s/ Brett L. Tolman

Brett L. Tolman John W. Mackay Loren E. Weiss Eric G. Benson Attorneys for David Young & Hernando County Holdings, LLC

# CERTIFICATE OF SERVICE

I hereby certify that on the 17<sup>th</sup> day of April, 2012, I electronically submitted the foregoing **AMENDED NOTICE OF VERIFIED CLAIM OF DAVID YOUNG** to the Clerk

of the Court using the EC/ECF system, which sent notification of such filing to the following:

Cy H. Castle Jean Weld Kristen M. Warden U.S. Attorney's Office for District of Utah 185 S. State Street, Suite 300 Salt Lake City, UT 84111

Daniel R. Deutsch Steven J. Brooks Deutsch Williams Brooks DeRensis & Holland P.C. One Design Center Place, Suite 600 Boston, MA 02210

Michael W. Young Parsons Behle 201 South Main Street #1800 Salt Lake City, UT 84111

Thomas J. Burns Durham Jones & Pinegar 111 East Broadway, Suite 900 Salt Lake City, UT 84110

,	/D E	ъ.	
/S/	Dawn E.	Bouvier	

1176555

David Young, as corporate officer of World Wide Trainers, being first duly sworn and under penalty of perjury does depose and state that he is the signer of this Verified Claim and that the facts set forth herein are true and correct to the best of his knowledge

David Young

STATE OF FLORIDA

COUNTY OF Hernando

)

On this <u>lbth</u> day of April, 2012, before me a Notary Public, personally appeared David Young, known to me to be the person whose name is subscribed to this instrument, and who by me duly sworn, acknowledged to me that he executed the same in his authorized capacity as corporate officer of World Wide Trainers and acknowledged to me that said World Wide Trainers executed the same and that the facts set forth therein are true and correct to the best of his knowledge.

Notary Public

David Young, as manager of Hernando County Holdings, being first duly sworn and under penalty of perjury does depose and state that he is the signer of this Verified Claim and that the facts set forth herein are true and correct to the best of his knowledge

David Young

STATE OF FLORIDA ) ss.
COUNTY OF Hernando )

On this 16th day of April, 2012, before me a Notary Public, personally appeared David Young, known to me to be the person whose name is subscribed to this instrument, and who by me duly sworn, acknowledged to me that he executed the same in his authorized capacity as manager of Hernando County Holdings and acknowledged to me that said Hernando County Holdings executed the same and that the facts set forth therein are true and correct to the best of his knowledge.

Notary Public

David Young, as corporate officer of Welventure, being first duly sworn and under penalty of perjury does depose and state that he is the signer of this Verified Claim and that the facts set forth herein are true and correct to the best of his knowledge

David Young

STATE OF FLORIDA )

SS.

COUNTY OF Hernando )

On this <u>lb</u> day of April, 2012, before me a Notary Public, personally appeared David Young, known to me to be the person whose name is subscribed to this instrument, and who by me duly sworn, acknowledged to me that he executed the same in his authorized capacity as corporate officer of Welventure and acknowledged to me that said Welventure executed the same and that the facts set forth therein are true and correct to the best of his knowledge.

Notary Public

David Young, as manager of Paper Mill Village, being first duly sworn and under penalty of perjury does depose and state that he is the signer of this Verified Claim and that the facts set forth herein are true and correct to the best of his knowledge

David Young

STATE OF FLORIDA ) ss.
COUNTY OF Hernando )

On this  $\frac{16^{16}}{10^{16}}$  day of April, 2012, before me a Notary Public, personally appeared David Young, known to me to be the person whose name is subscribed to this instrument, and who by me duly sworn, acknowledged to me that he executed the same in his authorized capacity as manager of Paper Mill Village and acknowledged to me that said Paper Mill Village executed the same and that the facts set forth therein are true and correct to the best of his knowledge.

Notary Public

David Young, being first duly sworn and under penalty of perjury does depose and state that he is the signer of this Verified Claim and that the facts set forth herein are true and correct to the best of his knowledge

David Young

STATE OF FLORIDA )
ss
COUNTY OF Hernando )

On this  $16^{\frac{1}{h}}$  day of April, 2012, before me a Notary Public, personally appeared David Young, known to me to be the person whose name is subscribed to this instrument, and acknowledged to me under oath that he executed the same and that the facts set forth therein are true and correct to the best of his knowledge.

Notary Public